

Mark C. Mao, CA Bar No. 236165  
 Beko Reblitz-Richardson, CA Bar No. 238027  
**BOIES SCHILLER FLEXNER LLP**  
 44 Montgomery St., 41st Floor  
 San Francisco, CA 94104  
 Tel.: (415) 293-6800  
 mmao@bsfllp.com  
 brichardson@bsfllp.com

Jesse Panuccio (admitted *pro hac vice*)  
**BOIES SCHILLER FLEXNER LLP**  
 1401 New York Ave, NW  
 Washington, DC 20005  
 Tel.: (202) 237-2727  
 Fax: (202) 237-6131  
 jpanuccio@bsfllp.com

Amanda K. Bonn, CA Bar No. 270891  
**SUSMAN GODFREY L.L.P.**  
 1900 Avenue of the Stars, Suite 1400  
 Los Angeles, CA 90067  
 Tel: (310) 789-3100  
 Fax: (310) 789-3150  
 abonn@susmangodfrey.com

*Attorneys for Plaintiffs*

William Christopher Carmody  
 (admitted *pro hac vice*)  
 Shawn J. Rabin (admitted *pro hac vice*)  
 Steven M. Shepard (admitted *pro hac vice*)  
 Alexander P. Frawley  
 (admitted *pro hac vice*)  
**SUSMAN GODFREY L.L.P.**  
 1301 Avenue of the Americas,  
 32<sup>nd</sup> Floor  
 New York, NY 10019  
 Tel.: (212) 336-8330  
 bcarmody@susmangodfrey.com  
 srabin@susmangodfrey.com  
 sshepard@susmangodfrey.com  
 afrawley@susmangodfrey.com

John A. Yanchunis (admitted *pro hac vice*)  
 Ryan J. McGee (admitted *pro hac vice*)  
 Michael F. Ram (admitted *pro hac vice*)  
 Ra O. Amen (admitted *pro hac vice*)  
**MORGAN & MORGAN**  
 201 N. Franklin Street, 7th Floor  
 Tampa, FL 33602  
 Tel.: (813) 223-5505  
 jyanchunis@forthepeople.com  
 rmcgee@forthepeople.com  
 mram@forthepeople.com  
 ramen@forthepeople.com

**UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA**

ANIBAL RODRIGUEZ, JULIEANNA  
 MUNIZ, ELIZA CAMBAY, SAL  
 CATALDO, EMIR GOENAGA, JULIAN  
 SANTIAGO, HAROLD NYANJOM,  
 KELLIE NYANJOM, and SUSAN LYNN  
 HARVEY, individually and on behalf of all  
 others similarly situated,

Plaintiffs,

vs.

GOOGLE LLC,

Defendant.

Case No.: 3:20-cv-04688

**ADMINISTRATIVE MOTION TO SEAL  
 PORTIONS OF PLAINTIFFS' MOTION  
 FOR RELIEF FROM CASE  
 MANAGEMENT SCHEDULE**

The Honorable Richard Seeborg  
 Courtroom 3 – 17th Floor  
 Date: December 9, 2021  
 Time: 1:30 p.m.

Pursuant to Civil Local Rules 7-11 and 79-5, Plaintiffs respectfully seek to seal certain portions of Plaintiffs' Motion for Relief from Case Management Schedule, which refers to and contains material designated by Google as "Confidential" or "Highly Confidential – Attorneys' Eyes Only."

This motion to seal pertains to the following information.

Document Sought to be Sealed	Party Claiming Confidentiality	Portions to be filed under seal	Basis for Sealing Portion of Document
Plaintiffs' Motion for Relief from Case Management Schedule	Google	Portions highlighted in <b>Blue</b> on Pages 6-8, 13, 15.	Refers to material designated "Confidential" or "Highly Confidential – Attorneys' Eyes Only" pursuant to the Protective Order
Declaration of Mark C. Mao In Support of Plaintiffs' Motion for Relief from Case Management Schedule	Google	Portions highlighted in <b>Blue</b> on Pages 3-5.	Refers to material designated "Confidential" or "Highly Confidential – Attorneys' Eyes Only" pursuant to the Protective Order
Ex. A to Mao Decl.	Google	Entirety	Material designated "Confidential" or "Highly Confidential – Attorneys' Eyes Only" pursuant to the Protective Order
Ex. B to Mao Decl.	Google	Entirety	Material designated "Confidential" or "Highly Confidential – Attorneys' Eyes Only" pursuant to the Protective Order
Ex. C to Mao Decl.	Google	Entirety	Material designated "Confidential" or "Highly Confidential – Attorneys' Eyes Only" pursuant to the Protective Order
Ex. D to Mao Decl.	Google	Entirety	Material designated "Confidential" or "Highly Confidential –

			Attorneys' Eyes Only" pursuant to the Protective Order
Ex. E to Mao Decl.	Google	Entirety	Material designated "Confidential" or "Highly Confidential – Attorneys' Eyes Only" pursuant to the Protective Order
Ex. F to Mao Decl.	Google	Entirety	Material designated "Confidential" or "Highly Confidential – Attorneys' Eyes Only" pursuant to the Protective Order

Pursuant to Civil Local Rule 79-5(e), Google, as the Designating Party, bears the responsibility to establish that its designated material is sealable.

Dated: October 29, 2021

Respectfully submitted,

By: /s/ Amanda Bonn

Amanda Bonn (CA Bar No. 270891)  
abonn@susmangodfrey.com  
SUSMAN GODFREY L.L.P.  
1900 Avenue of the Stars, Suite 1400  
Los Angeles, CA 90067  
Telephone: (310) 789-3100

Mark C. Mao (CA Bar No. 236165)  
mmao@bsflp.com  
Beko Rebitz-Richardson (CA Bar No. 238027)  
brichardson@bsflp.com  
BOIES SCHILLER FLEXNER LLP  
44 Montgomery Street, 41<sup>st</sup> Floor  
San Francisco, CA 94104  
Telephone: (415) 293 6858  
Facsimile (415) 999 9695

Jesse Panuccio (admitted *pro hac vice*)  
jpanuccio@bsflp.com  
BOIES SCHILLER FLEXNER LLP  
1401 New York Ave, NW  
Washington, DC 20005

1 Tel.: (202) 237-2727

2 Fax: (202) 237-6131

3 James Lee (admitted *pro hac vice*)

4 jlee@bsflp.com

5 BOIES SCHILLER FLEXNER LLP

6 100 SE 2<sup>nd</sup> Street, Suite 2800

7 Miami, FL 33131

8 Telephone: (305) 539-8400

9 Facsimile: (305) 539-1307

10 William Christopher Carmody (*pro hac vice*)

11 bcarmody@susmangodfrey.com

12 Shawn J. Rabin (*pro hac vice*)

13 srabin@susmangodfrey.com

14 Steven Shepard (*pro hac vice*)

15 sshepard@susmangodfrey.com

16 Alexander P. Frawley (*pro hac vice*)

17 afrawley@susmangodfrey.com

18 SUSMAN GODFREY L.L.P.

19 1301 Avenue of the Americas, 32<sup>nd</sup> Floor

20 New York, NY 10019

21 Telephone: (212) 336-8330

22 John A. Yanchunis (*pro hac vice*)

23 jyanchunis@forthepeople.com

24 Ryan J. McGee (*pro hac vice*)

25 rmcgee@forthepeople.com

26 Michael F. Ram (*pro hac vice*)

27 mram@forthepeople.com

28 Ra O. Amen (*pro hac vice*)

ramen@forthepeople.com

MORGAN & MORGAN, P.A.

201 N Franklin Street, 7th Floor

Tampa, FL 33602

Telephone: (813) 223-5505

Facsimile: (813) 222-4736

*Attorneys for Plaintiffs*